

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

2004 Aug 13 P 1:11

LOI TAN NGUYEN  
Plaintiff

v.

NMT Medical, Inc.  
Defendant

NO. \_\_\_\_\_

U.S. DISTRICT COURT  
DISTRICT OF MASS.

CIVIL ACTION

**MOTION FOR APPOINTMENT OF COUNSEL**

**Parties**

- 1) The plaintiff is a resident of 92 Saint Marks Road, Dorchester, MA 02124 and a citizen of the United States.
- 2) The defendant NMT Medical Inc. is located at 27 Wormwood Street, Boston, MA 02210

**Motion**

The plaintiff, for the below reasons, would like to request the court to appoint an attorney to represent plaintiff.

- 1) Financial hardship: In the past 12 months plaintiff received only 5 months of unemployment benefit (\$435 per week before tax) and that ended in February 2004. Plaintiff has been unable to hire an attorney due to financial difficulty.
- 2) Health conditions: Plaintiff has had chronic insomnia and brain disorder for the past 20 years. Under current tremendous pressure plaintiff has severely lost sleep. Severe deprivation of sleep reduces understanding and concentration abilities, and communication skill.
- 3) Language barrier and limited legal knowledge will prevent plaintiff from expressing ideas and prevent others from understanding what plaintiff needs to say.

Attachment: Doctor's evaluation.



Loi Tan Nguyen  
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